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Food Safety And Inspection Service
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AUDIT REPORT FOR POLAND

APRIL 11 THROUGH APRIL 30, 2001

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Poland's meat inspection system from April 11 through April 30, 2001. Seven of the 16 establishments certified to export meat to the United States were audited. All were combined slaughter/processing establishments.

The last on-site audit of Poland's inspection system was conducted in May/June 2000. Seven establishments were audited. Six establishments were acceptable; one establishment (Est. 30180603) was recommended for re-review because of pre-operational and operational Sanitation Standard Operating Procedures (SSOPs) deficiencies. In the other establishments, the following concerns arose as a result of the documents review and/or on-site establishments audit:

- In Establishments 33, 45, 46, 67, and 101 the HACCP plan lacked verification procedures for effective implementation/functioning and the monitoring frequency for critical limits (CLs) of critical control points (CCPs). Establishment 67 did not identify hazards likely to occur. Establishment 33 and 45 did not identify CCPs, and preventive actions taken for deficiencies noted. Establishment 33 did not have the HACCP plan signed and dated for the re-assessment. Establishment 268 lacked zero tolerance verification procedures for contamination with feces, ingesta and milk.
- Deficiencies were noted in the written SSOPs for pre-operational procedures (Est. 66 and 268), boneless meat re-inspection monitoring procedures, and corrective actions taken (Est. 33 and 66). In Establishment 67 microbiological standard violations were noted twice but no corrective action was recorded. Other deficiencies included cross-contamination of carcasses with dirty equipment, flaking paint in cooler and hallway (Est. 66 and 131), condensation in product flow area (Est. 45 and Est. 131, rusty equipment (Est. 66 and 267), cross contamination during dressing procedures, inadequate sanitizing of equipment, inadequate separating of drinking water supply for suspects animals and inadequate sterilizer temperature (Est. 267), dirty product containers (Est. 33), and rodenticides not being replenished in bait boxes and damaged recording thermometers (Est. 45).
- *Escherichia coli (E. coli)* testing is done by government laboratories, whereas the equivalence determination documents indicated testing is to be done by establishment (private) laboratories.
- Animal disease control deficiencies included inadequate segregation of suspect-carcasses (Est. 267).
- Species testing requirements were not being met.

- The Veterinary Drug Residues Laboratory in Pulawy, and the Poznan chemical and Microbiology Laboratory had deficiencies pertaining to expiration dates on residue standards; paging of laboratory logbooks, and intra-laboratory check samples analysis and concentration of check samples.

Poland's inspection service withdrew export eligibility of Establishments 30180603 and 267 to export to the United States for noncompliance of U.S. requirements. Establishment 30180603 was recommended for re-review in the audit of May/June 2000 but was not audited this year due to its removal from the U. S. certified list. Establishment 45 voluntarily withdrew its export eligibility to U.S. prior to this audit.

The documents and on-site audit during this visit indicated that all deficiencies noted during the previous FSIS audit had been corrected. However, generic *E. coli* testing was still being done by government laboratories instead of private laboratories as stated in equivalence determination documents.

Animal health restriction for beef product export to U.S. included *Bovine spongiform encephalopathy* (BSE), and for pork product included swine vesicular disease, and hog cholera.

During January through December 2000 Poland's establishments exported 16,117,123 lbs. pounds of cured pork product to the United States, of which 35,514 lbs. were rejected on port of entry re-inspection due to container condition, APHIS veterinary requirements, and transportation damage.

PROTOCOL

The on-site review was conducted in four parts. One part involved visits with Polish meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat inspection facilities preceding the on-site visits. The third part was conducted by on-site visits to seven establishments. The fourth was a visit to three laboratories: one official chemical and microbiological reference laboratory, and two private accredited laboratories testing chemical residues, *Escherichia coli (E. coli)*, *Salmonella* species, and *Listeria monocytogenes* (in ready-to-eat product).

Poland's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/processing controls, including the implementation of HACCP systems, and the *E. coli* testing program. (5) Compliance enforcement controls, including the testing program for species identification, *Salmonella* and *Listeria monocytogenes.*

During the on-site establishment visits, the auditor evaluated the nature, extent, and the degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate

product contamination/ adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

The auditor also verified information provided by Poland in response to FSIS questionnaire on Residue Control and Testing Program in 2000. This included records audit and discussion on laboratory testing, intra- and inter-agency legislation and regulatory authority on livestock health/husbandry, identification and movement, approval and use of veterinary and other regulated drugs, monitoring and control of feed additives and pre-mixes, residues withdrawal period compliance, and residue compliance enforcement. It also entailed a visit to a livestock farm near Pulawy.

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in all seven establishments audited. Details of audit findings, including compliance with HACCP; SSOP and testing for *Salmonella* and generic *E. coli* are discussed later in this report.

At the time of the on-site audit all establishments visited were acceptable. However, establishment documents review (Est. 33, 46, 58, 73, 101, 131, 139, and 201), and on-site audit of establishments records (Est. 3, 66, 67, 140, 268, 3431, and 30210224) indicated that HACCP requirements for *Listeria monocytogenes* in ready-to-eat product were not met; and pre-shipment reviews were not being performed. Following discussion and clarification of requirements related to HACCP requirements for *Listeria monocytogenes* in ready to eat product, Establishments 3, 33, 46, 58, 66, 67, 73, 101, 139, 140, 268, and 30210224 provided the written justification for "not being" a hazard in ready-to-eat product. Other deficiencies, it was stated, would be modified or included in the HACCP plans, and submitted to the Warsaw headquarters within four weeks for verification.

Polish Inspection Service stated that all establishments were being required to re-assess their HACCP plans to correct deficiencies noted during this audit, and submit to inspection officials for compliance verification during June 2001. It was also stated that establishments that failed to submit their modified/re-assessed plans would be removed from U.S. export eligibility.

Generic *E. coli* testing is done in Poland's official laboratories instead of private laboratories as indicated by Polish authorities in equivalence documents. It was stated that information to this effect would be provided to FSIS for equivalence determination.

Poland's residue control program was effective, and no variance was noted from the information provided to FSIS on 'Residue Control and Testing Program' in 2000.

Entrance Meeting

On March 11, 2001, an entrance meeting was held at the General Veterinary Inspectorate offices of the Poland's National Veterinary Services, and was attended by Dr. Iwona Zawinowska, Deputy Chief Veterinary Officer, Dr. Jan Szymborski, Head of Veterinary Public Health Division; Drs. Sebastian Hoffman and Miciej Szwolgin, Staff officer of Veterinary Public Health Division, Mr. Jim Higgiston, Agricultural Counselor and Mr. Poitr Rucinski, Agricultural Specialist, U.S. Embassy in Warsaw, and Dr. Hussain Magsi, FSIS, International Audit Staff Officer were present. Topics of discussion included the following:

- Structure and function of Poland's National Veterinary Service.
- Structure and function of residue and microbiology and chemical testing laboratories.
- Disease status according to U.S. Animal and Plant Health Inspection Service (APHIS).
- Changes in audit itinerary.
- Delistment-relistment establishment policy.
- SSOPs, HACCP, and generic *Escherichia coli (E. coli),* and *Salmonella* species testing.
- Microbiological and chemical analysis, and monitoring National Residue Control program.
- Compliance enforcement.

Headquarters Audit

There had been no significant changes in the organizational structure or upper level of inspection staffing since the last U.S. audit of Poland's inspection system in May 2000, except that Dr. Iwona Zawinowska was appointed to the position of Deputy Chief Veterinary Officer.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the inspection officials who normally conduct the periodic reviews for compliance with U.S. requirements lead the review of the individual establishments. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to establishments listed for record review (Est. 33, 46, 58, 73, 101, 131, 139, and 201). The records review focused primarily on food safety hazards, and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Label approval records.
- Sampling and analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs generic *E. coli, Salmonella* species, and *Listeria monocytogenes* testing.
- Sanitation, slaughter and processing inspection procedures and standards.

- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and inedible and condemned materials.
- Export product inspection and control including export certificates.
- National residue control program, and monitoring results.
- Enforcement records including examples of criminal prosecutions, consumer complaints, recalls, seizures and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

The following concerns arose as a result of examination of these documents:

1. HACCP requirement for *Listeria monocytogenes* in ready-to-eat product was not met.

2. Pre-shipment review was not being conducted.

Government Oversight

All inspection veterinarians and food inspectors in the establishments certified by Poland as eligible to export to the United States were full-time General Veterinary Inspectorate employees, receiving no remuneration from either industry or establishment personnel.

The auditor reviewed official animal health and inspection related records related to regulated drugs, residue withdrawal time, and identification of animals, transit certificates. No deviations were noted.

Establishment Audits

Sixteen establishments were certified for export of pork meat products to the United States at the time this audit was conducted. One establishment (Est. 45) voluntarily withdrew its certification for no-export interest immediately prior to this audit. Seven establishments were visited for on-site audits; six were selected randomly (Est. 3, 67, 140, 268, 3412, 30210224), and one additional establishment (Est. 66) was selected by the auditor for verification of corrective and preventive actions taken for deficiencies noted during the previous FSIS audit. At the time of audit, Poland's inspection system controls were in place to prevent, detect and control contamination and adulteration of products.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to the U.S. requirements. Information about the following risk areas was also collected:

1. Government oversight of accredited, approved, and private laboratories.

2. Inter-laboratory quality assurance procedures, including sample handling.
3. Methodology.

There are 16 regional animal health and food control official laboratories in the country. Of these, eight conduct residues and microbiological testing. The national reference laboratory for chemical and microbiological testing is located in Pulawy. The national residue control program is prepared according to European Union (EU) guidelines, and the number of samples are allocated to eight regional residue control laboratories for testing according to livestock population in the area, and the number of animals slaughtered annually.

Poland is in the process of preparing for national accreditation of laboratories. A national accreditation body has been nominated. The Polish laboratory testing norms are similar to U.S., but are being modified to conform with EU EN 45001 norms, and later to EN ISO/IEC 17025 in year 2002. The Pulawy laboratory also conducts certification/quality assurance audits, and sends inter-laboratory checks to these laboratories.

The auditor reviewed the latest audit reports in Pulawy and in regional laboratories in Warsaw and Gdansk. The Warsaw laboratory had several pieces of old and some antiquated analytical equipment. Some of these were being replaced. The laboratory needs renovation and facilities improvement, and can definitely use new equipment for analytical reliability. It was learned that renovation of facilities and acquisition of new analytical equipment was on government's top priority agenda.

The auditor evaluated technical adequacy and capability for testing U.S. required drugs, residue compounds/elements, and microorganisms. The procedures for sampling, analyses, and quality assurance were acceptable. The auditors determined that effective controls were in place for sampling procedures, analytical procedures, quality assurance procedures, and review procedures. The analytical methods used were standard, or internationally validated.

Establishment Operations by Establishment Number

The following operations were being conducted in the seven U.S.-certified establishments visited:

Establishment 3 – Swine slaughter, boning, cooked hams canning, and sausages
Establishment 66 – Beef and pork slaughter, boning, curing, sausages and canning
Establishment 67 – Pork slaughter, boning, and canned hams
Establishment 140 – Pork and beef slaughter, boning, canned hams, and sausages
Establishment 268 – Pork and beef slaughter, boning, caned hams, and sausages
Establishment 3431 – Pork and beef slaughter/cutup/boning, canned hams, and sausages
Establishment 30210224. - Pork slaughter/cutup/boning, canned hams, and sausages

SANITATION CONTROLS

Based on the on-site audits of establishments, Poland's inspection system had controls in place for: water potability records, chlorination procedures, back-siphonage prevention, hand washing facilities, separation of establishment, pest control program, temperature control, lighting, inspector work place, ventilation, facilities approval, equipment approval, product contact equipment, other product area, dry storage areas, welfare facilities, outside premises, personal dress and storage, product reconditioning, product transportation, effective maintenance program, operational sanitation and waste disposal.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic and other requirements for SSOPs were being met, according to the criteria employed in the U.S. domestic inspection program. For data collection instrument used, and individual establishment results see attachment A.

The SSOPs were found to meet the basic FSIS regulatory requirements.

ANIMAL DISEASE CONTROL

No changes in the epidemiological profile were noted since the last FSIS audit. No BSE or Foot and Mouth disease cases were reported.

RESIDUE CONTROLS

The auditor verified on-site the accuracy of Poland's response to the FSIS questionnaire using a checklist on "Criteria for Assessing the Adequacy of the Residue Control Program for Meat, Poultry, and Egg Products".

The national residue program includes: (1) identifying and evaluating drugs, pesticides and other chemical compounds of concern by slaughter class and/or egg product, (2) capability to analyze compounds of concern reliability, (3) appropriate regulatory follow-up of reports of violative tissue residues in meat, poultry and egg product, (4) collection, analysis, and reporting of these activities, and (4) anticipated testing plan to analyze compounds of concern reliability for specific slaughter classes and/or egg products for a specified time period.

In order to verify the response, and to determine the effectiveness of Poland's national residue program and to verify the information provided by Polish Government in 2000 in response to an FSIS questionnaire the following audit procedures were done: The auditor in collaboration with Poland's inspection service officials, (1) audited documents pertaining to sampling, analysis and action plans for violations, (2) discussed meat inspection program, livestock husbandry practice, use and distribution of feed additive/supplements, animal medicaments/drugs, and fertilizers with officials in Warsaw and various federal and state program officials. The auditor visited two of

the eight regional residue and microbiological monitoring laboratories in Warsaw and Gdansk, and national residue program officials in Pulawy Veterinary Institute. At a privately owned swine breeding and fattening farm near Pulawy, the auditor discussed husbandry and animal health practices with the farmer and veterinary officials. The observations and records review included inventories and authorized use of drugs and supplemental compounds/feed additives, and withdrawal time before slaughtering. Various federal officials discussed approval, distribution, use and control of drugs and compounds, and animal feed additives and supplements, identification, and residue withdrawal. It was stated that use of following drugs/chemicals had been prohibited: stilbenes, stilbene derivatives, salt and esters of thyrostats, β-antagonists, tenderizers, chloramphenicol, chloroform, chlorpromazine, colchozolsin, dapson, dimetrazol, metronidazol, nitrafuranes, ronidol, and antibiotics for growth.

FSIS evaluation criteria used for determining the adequacy of the residue control program included (1) background information on animal husbandry, availability of drug usage, agricultural chemicals and incidence of environmental contaminants and pesticides, (2) organization and legal basis of the government's activities to prevent contamination of food product with chemical residues, (3) residue plan design to obtain information to understand the basis and the process used to design the residue plan, (4) residue plan operations to obtain information on the basis and actual operation of residue plan, (5) compliance and enforcement activities to obtain information about actions taken to deal with residue findings as they occur, and (6) laboratories audit to obtain information on the general capabilities of analytical laboratories on their ability to assure the validity and reliability of test data.

The written documentation of Poland's residue control program was verified by the auditor, it provided effective control in case of violation of tolerance or action limits.

SLAUGHTER/ PROCESSING CONTROLS

Poland's inspection system had adequate controls in place to ensure export product safety. All establishments had adequate controls in place to prevent meat products intended for Poland's domestic consumption from being commingled with products eligible for export to the U.S.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis and Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The following deficiencies were noted in the establishments audited:

- Establishment documents (Est. 33, 46, 58, 73, 101, 131, 139, and 201) review, and onsite audit of establishments records (Est. 3, 66, 67, 140, 268, 3412, and 30210224) indicated that hazard analysis for *Listeria monocytogenes* was not conducted. Following discussion, Establishments 3, 33, 46, 58, 66, 67, 73, 101, 139, 140, 268, and 30210224 provided the

written justification for *Listeria monocytogenes* for not being a hazard in ready-to-eat product.

- In these establishments pre-shipment reviews were also not being conducted in these establishments.

Testing for Generic *E. coli*

Poland has adopted the FSIS regulatory requirements for generic *E. coli* testing.

Five establishments were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. However, official laboratories at the establishment premises, and/or in the official regional laboratories do the testing. The zero tolerance policy for fecal and ingesta contamination has been implemented. Process control actions are taken immediately. The data collection instrument used accompanies this report (Attachment C).

Generic *E. coli* testing is done in Poland's official laboratories instead of private laboratories as indicated by Polish authorities in equivalence documents. It was stated that clarification would be provided to FSIS.

ENFORCEMENT CONTROLS

Inspection System Controls

The Polish inspection system had controls in place to ensure adequate export product identification, inspector verification, export certificates, a single standard of control throughout the establishments, and products entering the establishments from outside sources. The regional laboratories report monitoring results directly to the Pulawy national reference laboratory, to the Provincial headquarters, and the Chief Veterinary Officer in Warsaw. In the case of residue violation, provincial veterinary officers who also coordinate national residue control program conduct the investigation, and punitive actions are taken according to the law by the responsible legislative body. Generally the inspection system controls (re-inspection, monitoring and verification) of establishment programs and controls, and documentation), at the time of audit, were in place, and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled.

Testing for *Salmonella* Species

The procedures and standards are same as U.S.-HACCP requirements for carcasses. However, the testing is done in an official laboratory located at the establishment premises and/or in the other accessible official laboratories. The data collection instrument used accompanies this report (Attachment D)

Species Verification Testing

At the time of this audit, Poland was not exempt from the species verification testing requirements. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements. The official Pulawy laboratory was performing species identification testing. The official inspectors were randomly collecting monthly samples.

Monthly Reviews

FSIS requires documented supervisory visits by a representative of the foreign inspection system to each establishment certified as eligible to export to the United States, not less frequently than one such visit per month, during any period when the establishment is engaged in producing product that could be used for exportation to the United States.

In the U.S. - certified establishments, the provincial district veterinary officers were supervising establishments monthly.

Enforcement Activities

The latest FSIS Quarterly Regulation and Enforcement Report Internet address (source) was provided to Warsaw headquarters for accessing the latest FSIS report.

In all provinces, the compliance and enforcement actions pertaining to fines, product confiscation, and imprisonment are properly legislated, and actions are taken when laws are violated. The auditor reviewed compliance and enforcement information in the provinces of Warsaw and Gdansk. Residue violations were controlled through the national legal process.

Exit Meeting

An exit meeting was conducted in Warsaw on April 30, 2001. The Polish participants were Dr. Iwona Zawinowska, Deputy Chief Veterinary Services; Dr. Jan Szymborski, Head of Veterinary Public Health Division and Maciej Szwolgin, Staff Officer Veterinary Public Health and Mr. Piotr Rocinski, Agricultural Specialist, U.S. Embassy, and Dr. Hussain Magsi, FSIS, International Audit staff Officer.

Topics for discussion included:

1. Establishment documents review of Establishments 33, 46, 58, 73, 101, 131, 139, and 201, and on-site audit of records of Establishment 3, 66, 67, 140, 268, 3431, and 30210224 indicated that hazard analysis for *Listeria monocytogenes* in ready-to-eat product was not conducted, and pre-shipment reviews were not being performed.

2. Generic *E. coli* testing was performed in Poland's official laboratories instead of private laboratories as indicated by Polish authorities in equivalence documents. It was stated that clarification would be provided to FSIS.

The inspection service officials stated that the HACCP implementation issues had been discussed with the industry, and they had committed to reassess their HACCP plan and submit the to the inspection service for official verification in June 2001. Polish officials assured the auditor that establishments that did not fully implement HACCP requirements would be removed from U.S. approved list.

CONCLUSION

Poland's inspection system in general meets U.S. requirements. However, HACCP requirements for *Listeria* as a hazard testing in ready-to-eat product have not been met. The generic *E. coli* testing is done in government laboratories, not private laboratories, as the equivalence determination stipulates.

(signed)Dr. Hussain Magsi, DVM, MS
Dr. Hussain Magsi, DVM, MS
International Audit Staff Officer

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instruments for generic *E. coli* testing
D. Data collection instruments for *Salmonella* testing
E. Laboratory Audit Forms
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the final report

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of the establishments visited on-site were evaluated as follows:

Est. No.	1. Written program addressed	2. Pre-op sanitation addressed	3. Operational sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible individual identified	7. Document-ation done daily	8. Dated and signed
3	√	√	√	√	√	√	√	√
66	√	√	√	√	√	√	√	√
67	√	√	√	√	√	√	√	√
140	√	√	√	√	√	√	√	√
268	√	√	√	√	√	√	√	√
3431	√	√	√	√	√	√	√	√
30210224	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the document audit:

Est. No.	1. Written program addressed	2. Pre-op sanitation addressed	3. Operational sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible individual identified	7. Document-ation done daily	8. Dated and signed
33	√	√	√	√	√	√	√	√
46	√	√	√	√	√	√	√	√
58	√	√	√	√	√	√	√	√
73	√	√	√	√	√	√	√	√
101	√	√	√	√	√	√	√	√
131	√	√	√	√	√	√	√	√
139	√	√	√	√	√	√	√	√
201	√	√	√	√	√	√	√	√

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment had conducted a hazard analysis.
3. The analysis includes food safety hazards likely to occur.
4. The analysis includes the intended use of or the consumers of the finished product(s).
5. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
8. The plan describes corrective actions taken when a critical limit is exceeded.
9. The HACCP plan was validated using multiple monitoring results.
10. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations, including pre-shipment review.
12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

Est. No	1. Flow diagram	2. Hazard analys. done	3. All hazards identif.	4. Use & users included.	5. Plan for each hazard	6. CCPs for all hazards analyzed.	7.Monit. critical limits, & freq. Specified	8.Corr-ective actions	9. Plan valida-ted	10. Adequate Verific. Proced.	11. Ade-quacy of docume-entation.	12. Dated and Signed
3	√	√	No	√	√	√	√	√	√	√	No	√
66	√	√	No	√	√	√	√	√	√	√	No	√
67	√	√	No	√	√	√	√	√	√	√	No	√
140	√	√	No	√	√	√	√	√	√	√	No	√
268	√	√	No	√	√	√	√	√	√	√	No	√
3431	√	√	No	√	√	√	√	√	√	√	No	√
30210224	√	√	No	√	√	√	√	√	√	√	No	√

3. *Listeria monocytogenes* as hazard likely to occur not analyzed.
11. Pre-shipment review not conducted.

Documentation was also audited from the following establishments that were not visited on-site, during the document audit:

Est. No	1. Flow diagram	2. Hazard analys. done	3. All hazards identif.	4. Use & users included.	5. Plan for each hazard	6. CCPs for all hazards analyzed.	7.Monit. critical limits, & freq. Specified	8.Corr-ective actions	9. Plan valida -ted	10. Adequate Verific. Proced.	11. Ade-quacy of docume-entation.	12. Dated and Signed
33	√	√	No	√	√	√	√	√	√	√	No	√
46	√	√	No	√	√	√	√	√	√	√	No	√
58	√	√	No	√	√	√	√	√	√	√	No	√
73	√	√	No	√	√	√	√	√	√	√	No	√
101	√	√	No	√	√	√	√	√	√	√	No	√
131	√	√	No	√	√	√	√	√	√	√	No	√
139	√	√	No	√	√	√	√	√	√	√	No	√
201	√	√	No	√	√	√	√	√	√	√	No	√

3.Listeria monocytogenes as hazard likely to occur not analyzed.
11. Pre-shipment review not conducted.

Attachment C

Data collection instruments for *E. coli* testing

All slaughter establishments were evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the equivalent criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

The results of these evaluations were as follows:

Est. No.	1. Written procedure	2. Sample collector designated	3.Sampling location given	4.Predominant spp. sampled	5.Sampling at required frequency	6.Proper site or method	7.Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
3	√	√	√	√	√	√	√	√	√	√
66	√	√	√	√	√	√	√	√	√	√
67	√	√	√	√	√	√	√	√	√	√
140	√	√	√	√	√	√	√	√	√	√
268	√	√	√	√	√	√	√	√	√	√
3431	√	√	√	√	√	√	√	√	√	√
30210224	√	√	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the document audit:

Est. No.	1. Written procedure	2. Sample collector designated	3.Sampling location given	4.Predominant spp. sampled	5.Sampling at required frequency	6.Proper site or method	7.Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
33	√	√	√	√	√	√	√	√	√	√
46	√	√	√	√	√	√	√	√	√	√
58	√	√	√	√	√	√	√	√	√	√
73	√	√	√	√	√	√	√	√	√	√
101	√	√	√	√	√	√	√	√	√	√
131	√	√	√	√	√	√	√	√	√	√
139	√	√	√	√	√	√	√	√	√	√
201	√	√	√	√	√	√	√	√	√	√

Attachment D

Data Collection instruments for *Salmonella* spp. Testing

All slaughter establishments were evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* species testing were met, according to the equivalent criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.
2. Carcasses are being sampled.
3. Ground product is being sampled.
4. The samples are being taken randomly.
5. The proper carcass site(s) and/or collection of proper product (carcass or ground) are being used for sampling.
6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. No.	1. Testing as required	2. Carcasses are sampled	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper production	7. Violative Est. stop operations
3	√	√	√	√	√	√
66	√	√	√	√	√	√
67	√	√	√	√	√	√
140	√	√	√	√	√	√
268	√	√	√	√	√	√
3431	√	√	√	√	√	√
30210224	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the document audit:

Est. No.	1. Testing as required	2. Carcasses are sampled	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper production	7. Violative Est. stop operations
33	√	√	√	√	√	√
46	√	√	√	√	√	√
58	√	√	√	√	√	√
73	√	√	√	√	√	√
101	√	√	√	√	√	√
131	√	√	√	√	√	√
139	√	√	√	√	√	√
201	√	√	√	√	√	√